



MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment
FROM: Karen Thomas, Case Manager
Joel Lawson, Associate Director Development Review
DATE: April 22, 2022

SUBJECT: BZA Case 20690 - Request for special exception relief install antennas on the penthouse roof of the building at 616 E Street N.W.

I. OFFICE OF PLANNING RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the following requested special exception:

- C § 1304.1 (b) – Mounted Height of Antenna Above the Roof (12 feet maximum permitted; 17 feet proposed.)

II. LOCATION AND SITE DESCRIPTION

Address:	616 E Street NW
Applicant	AT&T
Legal Description	Square 0457, Lot 0042
Ward / ANC	2/ ANC 2C03
Zone	D-6-R Intended to permit high-density mixed-use development in the downtown
Lot Characteristics	Irregular lot fronting 7 th Street to the west, E Street to the north and D Street to the south and abutting a 20-foot alley to the east.
Existing Development	The property is developed with a 12-story, 200-unit condominium building
Adjacent Properties	Three commercial storefronts on 7 th Street abut the building to its west.
Surrounding Neighborhood Character	The surrounding neighborhood is developed with medium to high- density mixed-use buildings with commercial office spaces and smaller commercial service uses with residential uses above ground floor commercial uses.
Proposed Development	The applicant proposes to install twelve (12) antennas on the roof of the subject property as replacement antennas for existing antennas on the roof of the building at 600 E Street, which would be demolished. The proposed antennas are intended to maintain coverage in the area for AT&T and the District's FirstNet system when the antennas are decommissioned at 600 E Street NW. The antennas would be mounted height on a pair of penthouses 17 feet above the roof and would therefore require relief from the regulations. The antennas would be screened to minimize their views on the roof and public space.

III. ZONING REQUIREMENTS and RELIEF REQUESTED

The proposed antennas would exceed the maximum permitted mounting height of 12 feet per C § 1304.1 (b). Roof-mounted antennas which do not comply with the requirements of C § 1304.1 (a) or (b), may be permitted through satisfaction of the special exception criteria of Subtitle C § 1312.

IV. OP ANALYSIS – C § 1312

Section	Criteria	OP Response
C§ 1312.1		
(a)	<i>A map of area to be served by the new antenna;</i>	A map of the existing service area is provided. Exhibit 7 Page 13
(b)	<i>A map and explanation of the area being inadequately served that necessitates installation of the proposed antenna</i>	Existing antennas at 600 E Street provide wireless coverage in the Penn Quarter neighborhood. However, these antennas will be soon decommissioned. The proposed location for the antennas is intended to maintain and upgrade service coverage in the neighborhood. The applicant stated that “...there are limited buildings in the target area with a sufficient height to provide adequate replacement coverage. The Property was the only adequate building with a landlord willing to lease AT&T space for the Rooftop Facility.”
(c)	<i>A map indicating the location of any other antennas and related facility sites providing service by the applicant, and any antenna tower or monopole of any provider, within a two (2) mile radius, including public space, of the proposed antenna site, with identified heights above grade;</i>	
(d)	<i>A site, and roof plan if applicable, showing all structures and antennas on site;</i>	The submission includes the site plan and roof plan showing the antennas’ proposed location. (Exhibit 4 Sheet A01)
(e)	<i>Elevation drawings of the structure and proposed antennas from all four (4) directions;</i>	These are provided as part of Exhibit 4. Sheet A01.
(f)	<i>A picture of the proposed antenna;</i>	Antennas are depicted in the drawings of Exhibit 4 and those shown on the penthouse roof in the photograph as a photo simulation including screening at Exhibit 5.
(g)	<i>The total mounted height of the antenna relative to the tops of surrounding trees as they presently exist within one-quarter mile (.25 mi.) of the proposed location; and</i>	There are no trees within the defined area that are the building’s height or taller.
(h)	<i>Other information as may be necessary for impact assessment of the antenna.</i>	OP does not require additional information to assess the impact as viewed from public space.
C§ 1312.2	<i>the Board of Zoning Adjustment may impose conditions pertaining to screening, buffering, lighting, or other matter necessary to protect adjacent and nearby property</i>	OP does not suggest screening or other conditions relative to the installation, due to the building’s height. The antennas would be screened to reduce visibility from public space, and from users of the building’s rooftop, as well as from other residential buildings in the immediate vicinity. See Exhibit 6

Subtitle X § 901

901.2 The Board of Zoning Adjustment is authorized under § 8 of the Zoning Act, D.C. Official Code § 6-641.07(g)(2), to grant special exceptions, as provided in this title, where, in the judgment of the Board of Zoning Adjustment, the special exceptions:

(a) Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;

The proposed use is presumed compatible within this zone district, subject to the Board's approval. The antennas would be in harmony with the intent and purpose of the Zoning Regulations, as they should not detract from the streetscape in this commercial neighborhood and their view would be minimal from public space as screening would be provided. The building's height would also help in minimizing the installation's view from public space.

(b) Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps; and

The antennas exist on nearby property without adverse impact to the use of neighboring property. The adjacent properties are within the same zone district and do not have residential uses. The requested deviation of the antennas' height by 5 feet and its screening from views should not adversely affect the use of the neighboring properties. The installed height at 138 feet above ground level, would provide replacement wireless services to the area to maintain AT&T's current coverage in the neighborhood.

(c) Will meet such special conditions as may be specified in this title.

The application and installation would satisfy other conditions specified for roof mounted antennas under C § 1304 (c) through (f).

III. COMMENTS OF OTHER DISTRICT AGENCIES

Comments from other District agencies have not been received to the record to date.

IV. COMMUNITY COMMENTS

ANC 3B filed a memo indicating that they voted to support this proposal, Exhibit 19.

LOCATION MAP

Proposed location of antennas:
616 E Street NW

Location of existing antennas:
600 E Street NW

